UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

VIKRAM P. GROVER d/b/a
"IX ADVISORS" a/k/a "IXA,"

:

Plaintiff,

:

V.

:

NET SAVINGS LINK, INC., a

Colorado corporation and formerly : organized as a Nevada corporation, : WILTON GROUP, LIMITED, as :

registered in the Isle of Man, U.K.,
WILTON UK (GROUP), LIMITED, as:

registered in England and Wales, U.K., CHINA FOOD AND BEVERAGE CO.,

a Colorado corporation, and

JAMES A. TILTON,

<u>Civil Action No. 1:21-CV-05054</u>

Honorable Mary M. Rowland

REQUEST FOR HEARING

ON AUGUST 16, 2024

Defendants.

:

v. PACIFIC STOCK TRANSFER,

NSAVX, INC., a Wyoming corporation, :

JOHN DOE CORP., a/k/a

NSAVX.COM, a Puerto Rican

corporation, and JOHN DOES 1-100,

:

Trustee-Defendants.

AFFIDAVIT OF PHILIP M. GIORDANO, ESQ. IN SUPPORT OF PLAINTIFF VIKRAM P. GROVER'S NOTICE OF NONCOMPLIANCE OF DEFENDANT NET SAVINGS LINK, INC. (NSAV) WITH COURT ORDERS AND REQUEST FOR SANCTIONS AND FINDINGS OF CONTEMPT

I, Philip M. Giordano, Esq., being duly sworn, depose and state as follows:

1) I am an attorney, admitted *pro hac vice*, to the United States District Court for the Northern District of Illinois in the instant case. My Firm and I are counsel to the Plaintiff, Vikram P. Grover, in the instant case. I make this Affidavit based upon my knowledge and understanding,

and in support of Plaintiff Vikram Grover's Notice of Noncompliance by Defendant Net Savings

Link, Inc. (NSAV) and Request for Sanctions (hereinafter the "Notice").

2) On August 8, 2024, I attended, on a remote basis, the hearing in which various

Motions, as filed by the Plaintiff, were considered by the Court.

3) Thereafter and through the ECF electronic filing system, I received the Minute

Entry, Dkt No. 196, dated August 8, 2024, in which, inter alia, "... NSAV was admonished that it

must IMMEDIATELY comply with the Court's prior orders dated 6/26/24 [167] [168]. By 8/14/24

at 4:00 CST, Defendant NSAV shall file a status report updating the Court on its compliance with

the prior orders...."

4) Prior to the filing of the Plaintiff's Notice and this Affidavit, I reviewed the Court's

Docket through PACER.

5) As of the time and date of the filing of this Affidavit and the Plaintiff's Notice and

as counsel to Mr. Grover, I have not received a status report from Defendant NSAV, its President,

or from NSAV's counsel, as ordered by the Court on August 8th.

6) As of the time and date of the filing of this Affidavit and the Plaintiff's Notice and

as counsel to Mr. Grover, I have not received any information or documents, as ordered by the

Court on June 26th and on August 8th, from Defendant NSAV, its President, or from NSAV's

counsel.

Signed under the pains and penalties of perjury, this 14th day of August 2024.

/s/ Philip M. Giordano_

Philip M. Giordano

Dated: August 14, 2024

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CERTIFICATE OF SERVICE

I, Philip M. Giordano, do hereby certify that on the 14th day of August, 2024, I caused to be served a true and correct copy of the Giordano Affidavit in Support of Plaintiff Vikram P. Grover's Notice of Noncompliance and Requests for Sanctions by Defendant Net Savings Link, Inc. (NSAV), with **Exhibits A-B**, and the Giordano Affidavit, as filed by and through the District Court's electronic filing/ECF system and that such true copy is available for downloading and viewing by all parties or counsel of record, and by emailing a true copy of the same to the following:

James A Tilton, *pro se* c/o Net Savings Link, Inc. 1942 Broadway Street, Suite 314C Boulder, CO 80302 Email: jamtilton@yahoo.com

Jawad I. Fitter, Esq. (Local Counsel Defendant NSAV) Bar ID Number: 6331338 Fitter Law, LLC 150 S. Wacker Drive, Suite 2400 Chicago, IL 60606

Tel: 312-741-1073

Email: Jawad@FitterLaw.com

Andrew Roman Perrong, Esq. (for prospective *Intervenor*) Perrong Law LLC 2657 Mt. Carmel Ave Glenside, PA 19038

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Jeffrey R. Tone, Esq. (Local Counsel for Plaintiff) KATTEN & TEMPLE, LLP The Rookery Building 209 South LaSalle Street, Suite 950 Chicago, Illinois 60604

Telephone: (312) 663-4400

Email: jtone@kattentemple.com

Dated: August 14, 2024 /s/ Philip M. Giordano
Philip M. Giordano